

# Required and Recommended Changes to the Unified Program Data Dictionary

*Prepared by the Cal/EPA Unified Program January 2011*

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## Summary

This document summarizes required and recommended changes to the Unified Program's Data Dictionary that Cal/EPA Unified Program staff has determined are needed to successfully implement electronic data exchange for CERS2. Cal/EPA is presenting this document in January 2011 to the Unified Program Data Management Steering Committee (DSC) for review and approval of recommended changes.

## Data Dictionary Issues

The Unified Program's Data Dictionary in CCR Title 27 was originally adopted in 1999, prior to the widespread use of XML as a data exchange technology, the much lower cost of data storage in the present day, and AB 2286 mandates for electronic reporting. This results in a number of problems with the existing data dictionary, including:

- Short field lengths were designed to presumably reduce data storage costs or accommodate paper forms, forcing abbreviations/truncations that reduce data usefulness/clarity.
- Some fields are not structured to correctly capture multiple values.
- Some fields don't reflect current federal data standards and/or are not ideally crafted for XML-based data exchange.

This document reflects a thorough review of the entire Title 27 data dictionary by the Cal/EPA Unified Program staff. It summarizes **required** changes that must be made to implement CERS electronic data exchange, **required** corrections of Title 27 fields and/or UPCF forms, and **recommended** changes to ensure data consistency into the future and ease of data entry by users. In some cases the changes were partially influenced by already collected data from UNIDOCS/CERS1, where data field lengths were not consistently applied to all data fields. In most cases these changes will have little if any impact on businesses or UPAs. However, UPAs using CERS as their primary business reporting tool who plan on exchanging data with CERS using their local systems may be impacted.

## Future Rulemaking

Cal/EPA intends to pursue a rulemaking process to incorporate all "required" changes identified in this document, as well as all "recommended" changes adopted by the Unified Program Data Management Steering Committee. This document identifies changes to the Data Dictionary resulting from the staff review. However, there are likely to be additional Title 27 Data Dictionary and UPCF inconsistencies and structural problems identified for which Cal/EPA may propose corrections/modification in future rulemaking processes.

## Document Organization

- This initial discussion section and a Table of Contents.
- A section on field changes spanning multiple portions of the Data Dictionary.
- A section on field changes for specific Data Dictionary fields/section.
- A section discussing other inconsistencies/problems between the Data Dictionary, UPCFs, and UNIDOCS/CERS forms.

Please note this document does include Data Dictionary changes/additions related to inspection/violation/enforcement fields that were approved by the DSC in Dec. 2010.

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## A. Changes Spanning Multiple Title 27 Chapters/UPCF Forms

### Addition of CERS ID Field (#1a) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	The numeric nine digit CERS ID will be assigned exclusively by the CERS system. Initial values started at 100000001. CERS IDs are assigned to a physical facility, and do not change when a facility's owners/operators change.
<b>Rationale</b>	CERS requires a fixed, non-changeable ID for each physical facility. The existing Facility ID definition includes geographic/jurisdictional elements that may change over time (e.g., merging/separating UPAs, newly incorporated cities). The Facility ID's six digit unique number may eventually not be large enough for UPAs with many facilities. Using a numeric primary identifier for facilities will allow more rapid and cost-effective report generation in CERS.
<b>Fields/Tables Impacted</b>	Field added to all tables which include the <i>Facility ID</i> field (#1). Chapter 1: Business Activities Chapter 1: Business Owner / Operator Identification Chapter 2: Hazardous Materials Inventory - Chemical Description Chapter 3: Underground Storage Tank - UST Certification of Installation/Modification Chapter 3: Underground Storage Tank - UST Monitoring Plan Chapter 3: Underground Storage Tank - UST Operating Permit Application-Facility Information Chapter 3: Underground Storage Tank - UST Operating Permit Application-Tank Information Chapter 4: Hazardous Waste - Certification of Financial Assurance Chapter 4: Hazardous Waste - Hazardous Waste Tank Closure Certification Chapter 4: Hazardous Waste - Onsite Hazardous Waste Treatment Notification - Facility Chapter 4: Hazardous Waste - Onsite Hazardous Waste Treatment Notification - Unit Chapter 4: Hazardous Waste - Onsite Tiered Permitting - Waste and Treatment Process Combinations Chapter 4: Hazardous Waste - Recyclable Materials Chapter 4: Hazardous Waste - Recyclable Materials Chapter 4: Hazardous Waste - Remote Waste Consolidation Site Annual Notification Chapter 5: Compliance Activity Information (Previously Approved) Chapter 5: Inspection Information (Previously Approved) Chapter 5: Violation Information (Previously Approved)

### Change Type of Obvious Numeric Fields from Alphanumeric to Numeric (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Redefine obvious numeric fields from alphanumeric to numeric types.
<b>Rationale</b>	There are many data dictionary fields that are obviously numeric but have an alphanumeric type. To reduce ambiguity and ensure data consistency, all of these fields should be re-defined as numeric types. These changes will also support more cost effective and rapid reports generation in CERS.
<b>Fields/Tables Impacted</b>	#437 Number of Compartments in the Unit #519 Total Number of Recyclable Materials #602a Number of Units = CESQT #602b Number of Units = CESW #602c Number of Units = CA #602d Number of Units = PBR #602e Number of Units = CEL #602f Number of Units = CE-CL #602g Number of Units = Total #608 Number of Tanks (Onsite Hazardous Waste Facility) #609 Number of Containers/Treatment Areas #611 Monthly Treatment Volume

#746a	Concentration of Flammable Vapor 1 = top
#746b	Concentration of Flammable Vapor 1 = center
#746c	Concentration of Flammable Vapor 1 = bottom
#747a	Concentration of Oxygen 1 = top
#747b	Concentration of Oxygen 1 = center
#747c	Concentration of Oxygen 1 = bottom
#749a	Concentration of Flammable Vapor 2 = top
#749b	Concentration of Flammable Vapor 2 = center
#749c	Concentration of Flammable Vapor 2 = bottom
#750a	Concentration of Oxygen 2 = top
#750b	Concentration of Oxygen 2 = center
#750c	Concentration of Oxygen 2 = bottom
#752a	Concentration of Flammable Vapor 3 = top
#752b	Concentration of Flammable Vapor 3 = center
#752c	Concentration of Flammable Vapor 3 = bottom
#753a	Concentration of Oxygen 3 = top
#753b	Concentration of Oxygen 3 = center
#753c	Concentration of Oxygen 3 = bottom

### Lengthen Chemical Name-related fields **(Recommended)**

<b>Status</b>	Recommended
<b>Description</b>	Various chemical name-related fields are currently AN(60).
<b>Rationale</b>	Chemical and chemical component names can potentially have very long names. Existing UNIDOCs/CERS1 chemical data (which could be considered a snapshot of statewide data) includes hundreds of chemicals that exceed the current AN(60) definition for the various chemical name fields in the Data Dictionary. There are no clear federal data standards for chemical name length. Based upon the UNIDOCs/CERS1 sample of reporting facilities in California, Cal/EPA is proposing lengthening all chemical name-related fields from AN(60) to AN(255) unless additional recommendations or standards information becomes available in the 1 <sup>st</sup> quarter for 2011.
<b>Fields/Tables Impacted</b>	Lengthen the field names shown below from AN(60) to AN(255): #205 Chemical Name #207 Common Name #227 Hazardous Component 1 Name #231 Hazardous Component 2 Name #235 Hazardous Component 3 Name #239 Hazardous Component 4 Name #243 Hazardous Component 5 Name #521 Common Name(Recyclable Materials) #528 Hazardous Constituent 1 #534 Hazardous Constituent 2 #540 Hazardous Constituent 3 #546 Hazardous Constituent 4

## Contact/Address Related Changes

### Lengthen City Address Fields **(Recommended)**

<b>Status</b>	Recommended
<b>Description</b>	Lengthening of the City address-related fields from AN(20) to AN(50).
<b>Rationale</b>	The current UNIDOCS/CERS1 data set includes several hundred records where the City is longer than 20 characters. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for <i>Locality Name</i> is AN(60).
<b>Fields/Tables Impacted</b>	#104 City (Business) #108b Business Mailing Address City #114 Business Owner City #120 Environmental Contact City #410 Property Owner City #417 Tank Owner City #428-4 Tank Operator City #508 City (Offsite Generator) #512 City for Mailing Address (Offsite Generator) #712 Financial Institution or Surety City #722 City (Remote Consolidation) #742 Tank Owner City (Closure) #757 Certifier City (Tank Closure)

### Lengthen ZIP Code Fields **(Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Lengthening of ZIP Code-related fields from AN(9) to AN(10)
<b>Rationale</b>	AN(10) allows for a full range of international postal codes. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for Mailing Address Postal Code is AN(14). However, Cal/EPA has not found sufficient justification to warrant more than 10 characters. By extending the field by one digit, we can support all international postal codes (with dashes) as well as US ZIP or ZIP+4 values (with dashes).
<b>Fields/Tables Impacted</b>	#105 ZipCode #116 Business Owner Zip Code #122 Environmental Contact Zip Code #108d Business Zip Code #412 Property Owner Zip Code #419 Tank Owner Zip Code #428-6 Tank Operator Zip Code #510 Zip Code (Offsite Generator) #514 Zip Code for Mailing Address (Offsite Generator) #714 Financial Institution or Surety Zip Code #723 Zip Code (Remote Consolidation) #744 Tank Owner Zip Code (Closure)

### Lengthen Phone Number Fields **(Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Lengthening of phone number fields from AN(15) to AN(25)
<b>Rationale</b>	The existing Title 27 definition for phone number fields specifies an area code, 7 digit number, and an extension. The current standard would not work for longer extension numbers. Additionally, some phone numbers will be international numbers with other length/formatting issues. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for phone fields is AN(25).

<b>Fields/Tables Impacted</b>	#102	Business Phone
	#110	Business Operator Phone
	#112	Business Owner Phone
	#118	Environmental Contact Phone
	#125	Primary Emergency Contact Business Phone Number
	#126	Primary Emergency Contact 24-Hour Phone
	#127	Primary Emergency Contact Pager Number
	#130	Secondary Emergency Contact Business Phone
	#131	Secondary Emergency Contact 24-Hour Phone
	#132	Secondary Emergency Contact Pager Number
	#408	Property Owner Phone
	#415	Tank Owner Phone
	#425	Applicant Phone (UST Facility)
	#428-2	Tank Operator Phone
	#487	Phone number
	#507	Phone (Offsite Generator)
#758	Certifier Phone (Tank Closure)	

### Addition of Country Fields for Addresses (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Addition of an AN(45) Country field to addresses which could potentially be out-of-state. All data exchanges should assume the default/assumed value is "United States".
<b>Rationale</b>	Aside from a facility's actual physical address which must be within California, there are several other sets of address fields in Title 27 for which entities/contacts will have an international address. Addition of this field will capture these cases. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for Country Name is AN(45).
<b>Fields/Tables Impacted</b>	Address-Related Fields for which <i>Country</i> field would be added: <ul style="list-style-type: none"> <li>• Owner/Operator Identification: #116a Business Owner , #122a Environmental Contact</li> <li>• Underground Storage Tank Permit: #412a Property Owner, #419a Tank Owner, #428-7 Tank Operator</li> <li>• Hazardous Waste Certification of Financial Assurance: #714a Financial Institution or Surety</li> <li>• Hazardous Waste Closure Certification: #744a Tank Owner</li> <li>• Hazardous Waste Recyclable Materials: #510a Street Address (Offsite Generator), #514a Mailing Address (Offsite Generator)</li> <li>• Hazardous Waste Remote Waste Consolidation Site Notification: #723a Remote Consolidation (street address)</li> </ul>

### Lengthen Name-related Fields Recommended

<b>Status</b>	Recommended
<b>Description</b>	Expand various Title 27 "name" fields that imply a complete first/last name (or potentially an organization name) from various shorter standards (20-35 characters) to an AN(80) standard.
<b>Rationale</b>	Most of these fields are too short for longer personal or organizational names, forcing business/organization users to abbreviate/truncate data and reduce its clarity. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for similar fields is AN(80).
<b>Fields/Tables Impacted</b>	#109 Business Operator Name #111 Business Owner Name #117 Environmental Contact Name #123 Primary Emergency Contact Name #128 Secondary Emergency Contact Name

#135	Document Preparer Name (Identification)
#136	Name of Signer of Identification
#406	Supervisor of Division, Section, or Office (Required for Public Agencies Only)
#407	Property Owner Name
#414	Tank Owner Name
#426	Applicant Name (UST Facility)
#428-1	Tank Operator Name
#471	Applicant Name
#482a	Name of Contractor Who Performed the Installation/Modification
#485	Certifier's Name
#488	Name of Certifier's Employer
#490-72	Name of first person having responsibility
#490-74	Name of second person having responsibility
#490-78	Applicant Name
#504	Offsite Generator Name
#516	Name of Document Preparer (Recyclable Materials)
#517	Certifier Name (Recyclable Materials)
#604	Owner/Operator Name (Onsite Hazardous Waste Facility)
#710	Financial Institution or Surety Name
#717	Owner/Operator Name (Financial Assurance)
#731	Owner/Operator Name (Remote Consolidation)
#740	Tank Owner Name (Closure)
#754	Certifier Name (Tank Closure)

**Lengthen Title Fields (Recommended)**

<b>Status</b>	Recommended
<b>Description</b>	Expand various Title 27 title-related fields from various shorter standards (25-25 characters) to an AN(50) standard.
<b>Rationale</b>	Many of these fields are too short for data already captured in UNIDOCS/CERS1. Shorter field lengths force business/organization users to abbreviate/truncate data and reduce its clarity. The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for similar fields is AN(50).
<b>Fields/Tables Impacted</b>	#124 Primary Emergency Contact Title #129 Secondary Emergency Contact Title #137 Title of Signer of Identification #486 Certifier's Title #490-73 Title of first person having responsibility #490-75 Title of second person having responsibility #490-79 Applicant Title #427 Applicant Title (UST Facility) #472 Applicant Title #718 Owner/Operator Title (Financial Assurance) #755 Certifier Title (Tank Closure) #605 Owner/Operator Title (Onsite Hazardous Waste Facility) #518 Certifier Title (Recyclable Materials) #732 Owner/Operator Title (Remote Consolidation)

## B. Changes for Specific Title 27 Chapters/UPCF Forms

### Business Activities Field Changes

#### Drop *Local Requirements* Field (#15) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	This <i>Local Requirements</i> field for Business Activities has an undefined type/length in the Data Dictionary.
<b>Rationale</b>	CERS will include a data dictionary of locally collected fields defined at the state level that can be electronically exchanged, eliminating the general need for this field. Cal/EPA wishes to eliminate this field to reduce confusion to reporters. See also “Business Activities Comments” field below.
<b>Fields/Tables Impacted</b>	Drop the Local Requirements field (#15)

#### Add *Business Activities Comments* Field (#16) (Recommended)

<b>Status</b>	Recommended
<b>Description</b>	AN(500)
<b>Rationale</b>	Reporters could use this optional field to provide additional information about their facility’s business activities that cannot be captured in other fields.
<b>Fields/Tables Impacted</b>	Add new AN(500) field #16 called <i>Business Activities Comments</i>

### Owner/Operator Information Field Changes

#### Change Type of *Dun and Bradstreet* Field to Numeric (#106) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Change the type of the Owner/Operator information <i>Dun and Bradstreet</i> field from AN(9) to N(9)
<b>Rationale</b>	This is the standard format for a DUNS number, both as defined by Dun & Bradstreet and Federal NEIEN standards.
<b>Fields/Tables Impacted</b>	Change type of #106 from AN(9) to N(9)

#### Change Type of *SIC Code* Field to Numeric (#107) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Change the SIC field from AN(4) to N(4)
<b>Rationale</b>	The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for SIC codes is represented as a numeric field.
<b>Fields/Tables Impacted</b>	Type of Field #107 is changed from AN(4) to numeric.

#### Change Type of *NAICS Code* to Numeric (#107a) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Change the NAICS Code field from AN(6) to N(6).
<b>Rationale</b>	The current Federal NEIEN <a href="#">facility identification data exchange standard</a> for NAICS codes is represented as a numeric field.
<b>Fields/Tables Impacted</b>	Type of Field #107a is changed from AN(6) to numeric.

### Revision of County Field (#108) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Drop the existing County field (#108) and replace with a numeric CountyID field (new #105a).
<b>Rationale</b>	The existing county standard AN(35) does not indicate if the word “County” should be included. Its placement/numbering also leaves ambiguity if the county values should relate to the physical facility or the facility mailing address. Existing UNIDOCs/CERS data is very diverse for this field. Replacing with a numeric key and relocating the field closer the facility physical/site address fields will help clarify the usage of this field.
<b>Fields/Tables Impacted</b>	Drop the existing County field (#108) Add new CountyID field (#105a).

### Renaming of Certain Mailing Address Fields (#108b, 108c, 108d) (Recommended)

<b>Status</b>	Recommended
<b>Description</b>	Include the term “mailing” in the Business City (#108b), Business State (#108c), and Business ZIP Code (#108d) fields names to clarify/differentiate them
<b>Rationale</b>	This is consistent with the naming of the Business Mailing Address field (#108a) and will reduce confusion about how these fields are different from fields #104 ( <i>City (Business)</i> ) and #105 ( <i>ZIP Code (Business)</i> ).
<b>Fields/Tables Impacted</b>	Change the field names as shown below: <ul style="list-style-type: none"> <li>• #108b “Business City” to “Business Mailing Address City”</li> <li>• #108c “Business State” to “Business Mailing Address State”</li> <li>• #108d “Business ZIP Code” to “Business Mailing Address ZIP Code”</li> </ul>

## Chemical Description Field Changes

### Revision of Chemical Description Fire Code Hazard Classes Field (#210) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	The existing AN(60) Fire Code Hazard Class field (#210) is an optional field for businesses to complete based on local UPA requirements. This field would be dropped and replaced by 8 new numeric fields (#210a-#210h) with numeric code values for each hazard class.
<b>Rationale</b>	While #210 is not a required field for all facilities statewide, businesses need a statewide definition for electronic reporting. The existing field (#210) is too vague and does not provide sufficient guidance at the statewide level for successful electronic data exchange.
<b>Fields/Tables Impacted</b>	Fields Dropped: <ul style="list-style-type: none"> <li>• #210, Fire Code Hazard Classes</li> </ul> Fields Added: <ul style="list-style-type: none"> <li>• #210a, Primary Fire Code Hazard Class N(2)</li> <li>• #210b, Secondary Fire Code Hazard Class N(2)</li> <li>• #210c, Tertiary Fire Code Hazard Class N(2)</li> <li>• #210d, Quaternary Fire Code Hazard Class N(2)</li> <li>• #210e, Fifth Fire Code Hazard Class N(2)</li> <li>• #210f, Sixth Fire Code Hazard Class N(2)</li> <li>• #210g, Seventh Fire Code Hazard Class N(2)</li> <li>• #210h, Eighth Fire Code Hazard Class N(2)</li> </ul>

	<p>Codes shared by all added fields:</p> <p>1-Carcinogen  2-Combustible Liquid, Class II  3-Combustible Liquid, Class III-A  4-Combustible Liquid, Class III-B  5-Corrosive  6-Cryogen  7-Explosive  8-Flammable Gas  9-Flammable Liquid, Class I-A  10-Flammable Liquid, Class I-B  11-Flammable Liquid, Class I-C  12-Flammable Solid  13-Highly Toxic  14-Irritant  15-Liquified Petroleum Gas  16-Magnesium  17-Oxidizing, Class 1  18-Oxidizing, Class 2  19-Oxidizing, Class 3  20-Oxidizing, Class 4</p> <p>21-Oxidizing Gas, Gaseous  22-Oxidizing Gas, Liquefied  23-Organic Peroxide, Class I  24-Organic Peroxide, Class II  25-Organic Peroxide, Class III  26-Organic Peroxide, Class IV  27-Other Health Hazard  28-Pyrophoric  29-Radioactive  30-Sensitizer  31-Toxic  32-Unstable(Reactive), Class 1  33-Unstable(Reactive), Class 2  34-Unstable(Reactive), Class 3  35-Unstable(Reactive), Class 4  36-Water Reactive, Class 1  37-Water Reactive, Class 2  38-Water Reactive, Class 3  39-Other</p>
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### Revise/Rename Additional Locally Collected Information Field (#246) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	The <i>Additional Locally Collected Information</i> field for Chemical Description is currently defined as AN(255). The field will be renamed to <i>Chemical Description Comments</i> and its length will be lengthened to AN(2000).
<b>Rationale</b>	Based upon recommendations from the CERS Regulator User Group and approvals from the Unified Program Data Steering Management Committee, electronic collection of locally collected fields will be handled via a defined set of specific locally collected fields, eliminating the need for this field. The field will be renamed to <i>Chemical Description Comments</i> with a primary purpose of storing data for additional mixture components (beyond the 5 components already supported in the Data Dictionary) as required in the UPCF's instructions.
<b>Fields/Tables Impacted</b>	Rename field #246 to <i>Chemical Description Comments</i> and change its type from AN(255) to AN(2000).

## UST-Related Field Changes

### Lengthen UST Permit *Additional Description* Field (#438) (Recommended)

<b>Status</b>	Recommended
<b>Description</b>	Currently an AN(70) local use only field for “additional tank or location description/information” which is not shown on the UPCF or in CERS1. Would lengthen to AN(500).
<b>Rationale</b>	Field is very short to support much description or other information. This lengthening would allow the field to act as the equivalent of a comments field on this form. This change would also align with the recommended new “Business Activities Comments” field (#16).
<b>Fields/Tables Impacted</b>	Lengthen #438 from AN(70) to AN(500).

### Revision of UST Tank *Steel Component Protection* Field (#448) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Replacement of #448 with three new true/false AN(1) fields (#448a, 448b, 448c) that accept either “Y” or “N” codes
<b>Rationale</b>	The UST Certification of Installation form instructions indicate that multiple values can be selected (i.e., Sacrificial Anodes, Impressed Current, and Isolation). Cal/EPA staff has confirmed that multiple values could potentially apply to a UST tank, so this correction is needed.
<b>Fields/Tables Impacted</b>	Field #448 is dropped. The following AN(1) fields would be added accepting values of “Y” or “N”: <ul style="list-style-type: none"> <li>• #448a Corrosion Protection: Sacrificial Anode</li> <li>• #448b Corrosion Protection: Impressed Current</li> <li>• #448c Corrosion Protection: Isolation</li> </ul>

### Revision of UST Tank *Overfill Prevention* Field (#452) (Required)

<b>Status</b>	REQUIRED
<b>Description</b>	Replacement of #452 with four new true/false AN(1) fields (#452a through #452d) that accept either “Y” or “N” codes.
<b>Rationale</b>	The UST Certification of Installation form instructions indicate that multiple values can be selected (i.e., Audible/Visual Alarms, Ball Float, Fill Tube Shut-Off Valve, and Exempt). Cal/EPA staff has confirmed that multiple values could potentially apply to a UST tank, so this correction is needed.
<b>Fields/Tables Impacted</b>	Field #452 is dropped. The following AN(1) fields would be added accepting values of “Y” or “N”: <ul style="list-style-type: none"> <li>• #452a Overfill Prevention: Audible/Visual Alarms</li> <li>• #452b Overfill Prevention: Ball Float</li> <li>• #452c Overfill Prevention: Fill Tube Shut-Off Valve</li> <li>• #452d Overfill Prevention: Exempt</li> </ul>

**Revision of UST Tank Piping/Turbine Containment Field (#464d) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Change the code value for “None” from “03” to “90”
<b>Rationale</b>	All other UST form values for “None” are coded as 90 except for this field and #464i. This correction will apply consistency across the data standard.
<b>Fields/Tables Impacted</b>	Only one of the three code values for this specific field (#464d) would change from “03” to “90.”

**Revision of UST Tank Vent Piping Transition Sumps Field (#464i) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Change the code value for “None” from “03” to “90”
<b>Rationale</b>	All other UST form values for “None” are coded as 90 except for this field and #464i. This correction will apply consistency across the data standard.
<b>Fields/Tables Impacted</b>	Only one of the three code values for this specific field (#464i) would change from “03” to “90.”

**Revision of UST Certification of Installation Type of Project Field (#483a) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Replacement of #483a with five new true/false AN(1) fields (#483a-1 through #483a-5) that accept either “Y” or “N” codes.
<b>Rationale</b>	The UST Certification of Installation form instructions indicate that multiple values can be selected (e.g., Tank Installation, Piping Installation, etc.). The instructions also indicate the form can be completed for “...installation or upgrading of tanks <b>and/or</b> piping associated with a UST system...”, implying multiple installation/upgrading activities can be represented on the form, justifying this correction.
<b>Fields/Tables Impacted</b>	Field #483a is dropped. The following AN(1) fields would be added accepting values of “Y” or “N”: <ul style="list-style-type: none"> <li>• #483a-1 Project Type: Tank</li> <li>• #483a-2 Project Type: Piping</li> <li>• #483a-3 Project Type: Sump</li> <li>• #483a-4 Project Type: Under Dispenser Containment</li> <li>• #483a-5 Project Type: Other</li> </ul>

**Correction of UST Monitoring Plan Programmed Tank Tests field (#490-18) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Change the description of first code value (01) from .01 GPH to .1 GPH to match the UPCF form.
<b>Rationale</b>	The UPCF UST Monitoring Plan form shows valid values for this field of 0.1 GPH, 0.2 GPH, and Other. Cal/EPA Technology Services believe that UPCF values are correct/intended value, so the Data Dictionary values need to be corrected to match the UPCF form.
<b>Fields/Tables Impacted</b>	Only the description of one of three code values for this specific field (#490-18) would be changed from .01 to .1 GPH.

**Lengthen the UST Monitoring Piping Secondary Containment Field (#490-29) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Correct the length of the AN(1) field to AN(2) to handle the two digit code values
<b>Rationale</b>	Field length is too small to store specified code values. Either the field is lengthened or the codes could be changed to numeric values. This recommendation is to lengthen the field.
<b>Fields/Tables Impacted</b>	Lengthen #490-29 from AN(1) to AN(2)

Superseded

## C. UPCF/Title 27/CERS Inconsistencies and other Problems

The following issues highlight inconsistencies across the Data Dictionary, UPCFs, and UNIDOCS/CERS1 forms. The recommended changes should be reviewed carefully by appropriate subject matter experts to ensure the recommended solution is appropriate. Several other issues offer potential solutions but no recommendation—the committee needs to provide direction to Cal/EPA on the preferred solution.

### Business Activities Forms Omit *Upgrade/Install Underground Storage Tank Field (#6)*

**(Required/Direction Needed)**

<b>Status</b>	<b>CHANGE REQUIRED BUT DIRECTION NEEDED</b>					
<b>Description</b>	Field #6 (Upgrade/Install Underground Storage Tank) is an AN(1) Y/N field to report if the facility intends to install or upgrade a UST. This field is not currently implemented on the Business Activities UPCF of CERS1 forms.					
	6	Upgrade/Install Underground Storage Tank	Y or N	1	AN	Facility must report if it intends to install or upgrade USTs containing hazardous substances defined in HSC, 25316. Triggers requirement for UST installation data elements.
<b>Rationale</b>	QUESTION: Should field #6 be: <ul style="list-style-type: none"> <li>• Included in CERS1 (and future UPCF updates), or</li> <li>• Dropped from the Title 27 Data Dictionary?</li> </ul>					
<b>Impacts</b>	TBD					

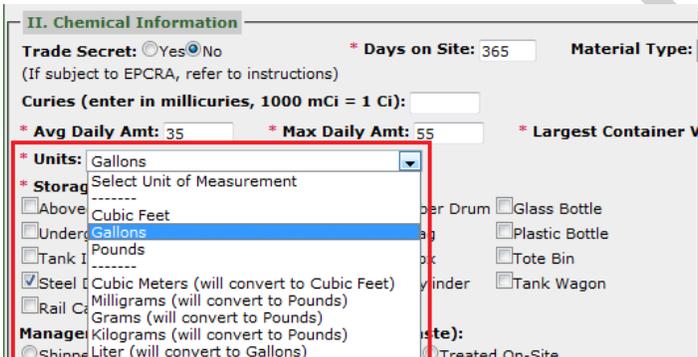
### Business Activities Forms Omit *Underground Storage Tank Closure Field (#7)* **(Required/Direction Needed)**

<b>Status</b>	<b>CHANGE REQUIRED BUT DIRECTION NEEDED</b>					
<b>Description</b>	Field #7 (Underground Storage Tank Closure) is an AN(1) Y/N field to report if the facility intends to install or upgrade a UST. This field is not currently implemented on the Business Activities UPCF of CERS1 forms.					
<b>Rationale</b>	QUESTION: Should field #7 be: <ul style="list-style-type: none"> <li>• Included in CERS1 (and future UPCF updates), or</li> <li>• Dropped from the Title 27 Data Dictionary?</li> </ul>					
<b>Impacts</b>	TBD					

### Chemical Description Form *Physical State Field (#214)* **(Required)**

<b>Status</b>	REQUIRED					
<b>Description</b>	Field #214 (Physical State) has three valid values in the data dictionary: solid, liquid or gas. UNIDOCS and CERS1 forms currently also show an additional fourth value called 'Unknown'.					
<b>Rationale</b>	CERS1 should align with the UPCF and the Data Dictionary by NOT showing an unauthorized value for this field.					
<b>Impacts</b>	CERS1 form will be modified. Submissions with the invalid value will have a note made of the invalid value in the Field #246.					

**Chemical Description Forms Units (Inventory) Field (#221) (Required)**

<b>Status</b>	REQUIRED													
<b>Description</b>	<p>Field #221 describes which unit of measure is most appropriate for the material being reported. The values in the UPCF form are not represented in the same order or code values as the Title 27 Data Dictionary. The CERS screen is missing an option value for 'Tons'.</p> <table border="1"> <tr> <td>221</td> <td>Units (Inventory)</td> <td>a = cubic feet b = pounds c = tons d = gallons</td> <td>1</td> <td>AN</td> <td>Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).</td> </tr> </table> <p>UPCF Form</p> <table border="1"> <tr> <td>UNITS* (Check one item only)</td> <td><input type="checkbox"/> a. GALLONS</td> <td><input type="checkbox"/> b. CUBIC FEET</td> <td><input type="checkbox"/> c. POUNDS</td> <td><input type="checkbox"/> d. TONS</td> <td>221</td> <td>DAYS ON SITE:</td> </tr> </table> <p>CERS1 Form</p> 	221	Units (Inventory)	a = cubic feet b = pounds c = tons d = gallons	1	AN	Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).	UNITS* (Check one item only)	<input type="checkbox"/> a. GALLONS	<input type="checkbox"/> b. CUBIC FEET	<input type="checkbox"/> c. POUNDS	<input type="checkbox"/> d. TONS	221	DAYS ON SITE:
221	Units (Inventory)	a = cubic feet b = pounds c = tons d = gallons	1	AN	Unit of measure which is most appropriate for the material being reported on this page. NOTE: If the material is a federally defined Extremely Hazardous Substance (EHS), all amounts must be reported in pounds. If material is a mixture containing an EHS, report the units that the material is stored in (gallons, pounds, cubic feet, or tons).									
UNITS* (Check one item only)	<input type="checkbox"/> a. GALLONS	<input type="checkbox"/> b. CUBIC FEET	<input type="checkbox"/> c. POUNDS	<input type="checkbox"/> d. TONS	221	DAYS ON SITE:								
<b>Rationale</b>	CERS1 and the UPCF should align with the Data Dictionary code values for this field.													
<b>Impacts</b>	CERS1 and UPCF form will be modified.													

**Chemical Description Form Storage Container=Other Field (#223r) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Field #214 (Physical State) is a AN(30) field allowing a reporter to describe an alternate container type in which hazardous materials are stored. UPCF and CERS1 forms currently express this field as a checkbox rather than a free form text field.
<b>Rationale</b>	The UPCF and CERS1 forms should be modified to correctly express the value of this field.
<b>Impacts</b>	The UPCF and CERS1 forms will be modified.

**Chemical Description Form Storage Pressure Field (#224) (Required/Direction Needed)**

<b>Status</b>	CHANGE REQUIRED BUT DIRECTION NEEDED											
<b>Description</b>	<p>Field #224 (Physical State) is a AN(1) field representing the pressure at which a hazardous material is stored. The codes/values on the UPCF (b=Above Ambient, c=Below Ambient) do not match the field #224 Data Dictionary code values (b=Below Ambient, c=Above Ambient).</p> <table border="1"> <tr> <td>224</td> <td>Storage Pressure</td> <td>a = ambient b = below ambient c = above ambient</td> <td>1</td> <td>AN</td> <td>Pressure at which hazardous material is stored.</td> </tr> </table> <p>UPCF Form</p> <table border="1"> <tr> <td>STORAGE PRESSURE</td> <td><input type="checkbox"/> a. AMBIENT</td> <td><input type="checkbox"/> b. ABOVE AMBIENT</td> <td><input type="checkbox"/> c. BELOW AMBIENT</td> <td>224</td> </tr> </table> <p>CERS1 Form</p>	224	Storage Pressure	a = ambient b = below ambient c = above ambient	1	AN	Pressure at which hazardous material is stored.	STORAGE PRESSURE	<input type="checkbox"/> a. AMBIENT	<input type="checkbox"/> b. ABOVE AMBIENT	<input type="checkbox"/> c. BELOW AMBIENT	224
224	Storage Pressure	a = ambient b = below ambient c = above ambient	1	AN	Pressure at which hazardous material is stored.							
STORAGE PRESSURE	<input type="checkbox"/> a. AMBIENT	<input type="checkbox"/> b. ABOVE AMBIENT	<input type="checkbox"/> c. BELOW AMBIENT	224								

	<div style="border: 1px solid black; padding: 5px;"> <p><b>II. Chemical Information</b></p> <p>Trade Secret: <input type="radio"/> Yes <input checked="" type="radio"/> No      * Days on Site: 365      Material Type: Non-Waste</p> <p>(If subject to EPCRA, refer to instructions)</p> <p>Curies (enter in millicuries, 1000 mCi = 1 Ci):</p> <p>* Avg Daily Amt: 35      * Max Daily Amt: 55      * Largest Container Volume: 55</p> <p>* Units: Gallons</p> <p>* Storage Container (check all that apply):</p> <p><input type="checkbox"/> Aboveground Tank   <input type="checkbox"/> Plastic/Nonmetal Drum   <input type="checkbox"/> Fiber Drum   <input type="checkbox"/> Glass Bottle</p> <p><input type="checkbox"/> Underground Tank   <input type="checkbox"/> Can   <input type="checkbox"/> Bag   <input type="checkbox"/> Plastic Bottle</p> <p><input type="checkbox"/> Tank Inside Building   <input type="checkbox"/> Carboy   <input type="checkbox"/> Box   <input type="checkbox"/> Tote Bin</p> <p><input checked="" type="checkbox"/> Steel Drum   <input type="checkbox"/> Silo   <input type="checkbox"/> Cylinder   <input type="checkbox"/> Tank Wagon</p> <p><input type="checkbox"/> Rail Car   <input type="checkbox"/> Other</p> <p>Management Method (required if material is waste):</p> <p><input type="radio"/> Shipped Off-Site   <input type="radio"/> Recycled On-Site   <input type="radio"/> Treated On-Site</p> <p>* Storage Pressure:</p> <p><input checked="" type="radio"/> Ambient   <input type="radio"/> Above Ambient   <input type="radio"/> Below Ambient</p> <p>* Storage Temperature:</p> <p><input checked="" type="radio"/> Ambient   <input type="radio"/> Above Ambient   <input type="radio"/> Below Ambient   <input type="radio"/> Cryogenic</p> </div>
<p><b>Rationale</b></p>	<p>The UPCF and Data Dictionary values need to be reconciled. However, existing data systems may be following either standard (UPCF or Data Dictionary) depending upon whether their design was based upon the Data Dictionary or the UPCF.</p> <p>Question: Should the code values for this field be corrected to:</p> <ul style="list-style-type: none"> <li>• Match Field #224 code values in the Data Dictionary (i.e., UPCF is modified)?, or</li> <li>• Match the code values on the UPCF (i.e., Data Dictionary codes are modified).</li> </ul>
<p><b>Impacts</b></p>	<p>To be determined</p>

**Chemical Description Form Storage Temperature Field (#225) (Required/Direction Needed)**

<p><b>Status</b></p>	<p><b>CHANGE REQUIRED BUT DIRECTION NEEDED</b></p>						
<p><b>Description</b></p>	<p>Field #225 (Storage Temperature) is a AN(1) field representing the temperature at which a hazardous material is stored. The codes/values on the UPCF (b=Above Ambient, c=Below Ambient) do not match the field #225 Data Dictionary code values (b=Below Ambient, c=Above Ambient). CERS1 form are not represented in the same order or code values as the Title 27 Data Dictionary.</p> <table border="1" data-bbox="358 1205 1474 1318"> <tr> <td>225</td> <td>Storage Temperature</td> <td>a = ambient b = below ambient c = above ambient d = cryogenic</td> <td>1</td> <td>AN</td> <td>Temperature at which hazardous material is stored.</td> </tr> </table>	225	Storage Temperature	a = ambient b = below ambient c = above ambient d = cryogenic	1	AN	Temperature at which hazardous material is stored.
225	Storage Temperature	a = ambient b = below ambient c = above ambient d = cryogenic	1	AN	Temperature at which hazardous material is stored.		
<p><b>UPCF Form</b></p>							
<p>STORAGE TEMPERATURE   <input type="checkbox"/> a. AMBIENT   <input type="checkbox"/> b. ABOVE AMBIENT   <input type="checkbox"/> c. BELOW AMBIENT   <input type="checkbox"/> d. CRYOGENIC      225</p>							
<p><b>CERS1 Form</b></p>							
<div style="border: 1px solid black; padding: 5px;"> <p><b>II. Chemical Information</b></p> <p>Trade Secret: <input type="radio"/> Yes <input checked="" type="radio"/> No      * Days on Site: 365      Material Type: Non-Waste</p> <p>(If subject to EPCRA, refer to instructions)</p> <p>Curies (enter in millicuries, 1000 mCi = 1 Ci):</p> <p>* Avg Daily Amt: 35      * Max Daily Amt: 55      * Largest Container Volume: 55</p> <p>* Units: Gallons</p> <p>* Storage Container (check all that apply):</p> <p><input type="checkbox"/> Aboveground Tank   <input type="checkbox"/> Plastic/Nonmetal Drum   <input type="checkbox"/> Fiber Drum   <input type="checkbox"/> Glass Bottle</p> <p><input type="checkbox"/> Underground Tank   <input type="checkbox"/> Can   <input type="checkbox"/> Bag   <input type="checkbox"/> Plastic Bottle</p> <p><input type="checkbox"/> Tank Inside Building   <input type="checkbox"/> Carboy   <input type="checkbox"/> Box   <input type="checkbox"/> Tote Bin</p> <p><input checked="" type="checkbox"/> Steel Drum   <input type="checkbox"/> Silo   <input type="checkbox"/> Cylinder   <input type="checkbox"/> Tank Wagon</p> <p><input type="checkbox"/> Rail Car   <input type="checkbox"/> Other</p> <p>Management Method (required if material is waste):</p> <p><input type="radio"/> Shipped Off-Site   <input type="radio"/> Recycled On-Site   <input type="radio"/> Treated On-Site</p> <p>* Storage Pressure:</p> <p><input checked="" type="radio"/> Ambient   <input type="radio"/> Above Ambient   <input type="radio"/> Below Ambient</p> <p>* Storage Temperature:</p> <p><input checked="" type="radio"/> Ambient   <input type="radio"/> Above Ambient   <input type="radio"/> Below Ambient   <input type="radio"/> Cryogenic</p> </div>							

<b>Rationale</b>	The UPCF and Data Dictionary values need to be reconciled. However, existing data systems may be following either standard (UPCF or Data Dictionary) depending upon whether their design was based upon the Data Dictionary or the UPCF. Question: Should the code values for this field be corrected to: <ul style="list-style-type: none"> <li>• Match Field #224 code values in the Data Dictionary (i.e., UPCF is modified)?, or</li> <li>• Match the code values on the UPCF (i.e., Data Dictionary codes are modified).</li> </ul>
<b>Impacts</b>	To be determined

**UST Tank Under Dispenser Containment Construction Type Field Problem (#469a) (Required)**

<b>Status</b>	REQUIRED																	
<b>Description</b>	Title 27 does not have a “None” option as shown on the UPCF form (and CERS1). However it does have a “No Dispensers” code. <table border="1" style="margin-left: 40px;"> <tr> <th colspan="5">VII. UNDER DISPENSER CONTAINMENT (UDC)</th> </tr> <tr> <td>CONSTRUCTION TYPE</td> <td><input type="checkbox"/> 1. SINGLE WALL</td> <td><input type="checkbox"/> 2. DOUBLE WALL</td> <td><input type="checkbox"/> 3. NO DISPENSERS</td> <td><input checked="" type="checkbox"/> 90. NONE</td> <td style="font-size: small;">469a.</td> </tr> <tr> <td>CONSTRUCTION MATERIAL</td> <td><input type="checkbox"/> 1. STEEL</td> <td><input type="checkbox"/> 4. FIBERGLASS</td> <td><input type="checkbox"/> 10. RIGID PLASTIC</td> <td><input type="checkbox"/> 99. OTHER (Specify)</td> <td style="font-size: small;">469b. 469c.</td> </tr> </table>	VII. UNDER DISPENSER CONTAINMENT (UDC)					CONSTRUCTION TYPE	<input type="checkbox"/> 1. SINGLE WALL	<input type="checkbox"/> 2. DOUBLE WALL	<input type="checkbox"/> 3. NO DISPENSERS	<input checked="" type="checkbox"/> 90. NONE	469a.	CONSTRUCTION MATERIAL	<input type="checkbox"/> 1. STEEL	<input type="checkbox"/> 4. FIBERGLASS	<input type="checkbox"/> 10. RIGID PLASTIC	<input type="checkbox"/> 99. OTHER (Specify)	469b. 469c.
VII. UNDER DISPENSER CONTAINMENT (UDC)																		
CONSTRUCTION TYPE	<input type="checkbox"/> 1. SINGLE WALL	<input type="checkbox"/> 2. DOUBLE WALL	<input type="checkbox"/> 3. NO DISPENSERS	<input checked="" type="checkbox"/> 90. NONE	469a.													
CONSTRUCTION MATERIAL	<input type="checkbox"/> 1. STEEL	<input type="checkbox"/> 4. FIBERGLASS	<input type="checkbox"/> 10. RIGID PLASTIC	<input type="checkbox"/> 99. OTHER (Specify)	469b. 469c.													
<b>Rationale</b>	The UPCF shows values not available in the Data Dictionary. Presumably “No Dispensers” and “None” have the same overall meaning.																	
<b>Impacts</b>	The UPCF title “UST Operating Permit Application—Tank Information” will need to be modified to exclude the “None” value for #469a.																	

**UST Tank Under Dispenser Containment (UDC) Construction Material Field Problem (#469b) (Required)**

<b>Status</b>	REQUIRED
<b>Description</b>	Title 27 has a “Concrete” and “None” codes for this field that are not present on the UPCF form (or in CERS1).
<b>Rationale</b>	The UPCF does not show all of the values available in the Data Dictionary.
<b>Impacts</b>	The UPCF title “UST Operating Permit Application—Tank Information” will need to be modified to show all valid values for #469b.

**UST Certification of Install. Certifier’s Relationship to Tank Owner Field Problem (#489-29) (Required)**

<b>Status</b>	REQUIRED						
<b>Description</b>	The Data Dictionary restricts users to specify a single relationship between the Certifier and the Tank Owner. The UPCF form’s instructions tell users to check the appropriate box (not box(es)). CERS allows users to choose more than one relationship between the Certifier and the Tank Owner. <table border="1" style="margin-left: 40px;"> <tr> <td style="width: 10%;">489</td> <td style="width: 20%;">Certifier’s Relationship to Tank Owner</td> <td style="width: 30%;">01 = tank owner 02 = tank operator 03 = contractor 04 = property owner 05 = other authorized agent of tank owner.</td> <td style="width: 10%;">2</td> <td style="width: 10%;">AN</td> <td style="width: 20%;">Relationship of person signing the page to the UST owner.</td> </tr> </table> <p><b>UPCF Form</b></p>	489	Certifier’s Relationship to Tank Owner	01 = tank owner 02 = tank operator 03 = contractor 04 = property owner 05 = other authorized agent of tank owner.	2	AN	Relationship of person signing the page to the UST owner.
489	Certifier’s Relationship to Tank Owner	01 = tank owner 02 = tank operator 03 = contractor 04 = property owner 05 = other authorized agent of tank owner.	2	AN	Relationship of person signing the page to the UST owner.		

	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">CERTIFIER'S NAME (print) <span style="float: right;">485.</span></td> <td style="width: 50%;">CERTIFIER'S TITLE: <span style="float: right;">486.</span></td> </tr> <tr> <td>NAME OF CERTIFIER'S EMPLOYER (DBA) <span style="float: right;">488.</span></td> <td> <b>CERTIFIER'S RELATIONSHIP TO TANK OWNER</b> <span style="float: right;">489.</span>  <input type="checkbox"/> 1. TANK OWNER      <input type="checkbox"/> 2. TANK OPERATOR  <input type="checkbox"/> 3. CONTRACTOR      <input type="checkbox"/> 4. PROPERTY OWNER  <input type="checkbox"/> 5. OTHER AUTHORIZED AGENT OF TANK OWNER </td> </tr> </table> <p>489. CERTIFIER'S RELATIONSHIP TO TANK OWNER – Check the appropriate box to indicate the nature of the relationship between the person signing the form and the tank owner.</p> <p><b>CERS1</b></p> <div style="border: 1px solid gray; padding: 5px;"> <p><b>III. Certification</b></p> <p>I certify that the information provided herein is true, accurate, and that the following conditions have been satisfied:</p> <ul style="list-style-type: none"> <li>The installer has met the requirements set forth in 23 CCR §2715, subdivisions (g) and (h).</li> <li>The underground storage tank, any primary piping, and any secondary containment was installed according to applicable voluntary consensus standards and any manufacturer's written installation instructions.</li> <li>All work listed in the manufacturer's installation checklist has been completed.</li> <li>The installation has been inspected and approved by the local agency, or if required by the local agency, inspected and certified by a registered professional engineer having education and experience with underground storage tank system installations.</li> </ul> <p>Certifier's Name: _____  Certifier's Title: _____  Phone: _____  Date: _____  Name of Certifier's Employer (DBA): _____</p> <p><b>Certifier's Relationship to Tank Owner:</b></p> <input type="checkbox"/> 1. Tank Owner  <input type="checkbox"/> 2. Tank Operator  <input type="checkbox"/> 3. Contractor  <input type="checkbox"/> 4. Property Owner  <input type="checkbox"/> 5. Other Authorized Agent of Tank Owner </div>	CERTIFIER'S NAME (print) <span style="float: right;">485.</span>	CERTIFIER'S TITLE: <span style="float: right;">486.</span>	NAME OF CERTIFIER'S EMPLOYER (DBA) <span style="float: right;">488.</span>	<b>CERTIFIER'S RELATIONSHIP TO TANK OWNER</b> <span style="float: right;">489.</span> <input type="checkbox"/> 1. TANK OWNER <input type="checkbox"/> 2. TANK OPERATOR <input type="checkbox"/> 3. CONTRACTOR <input type="checkbox"/> 4. PROPERTY OWNER <input type="checkbox"/> 5. OTHER AUTHORIZED AGENT OF TANK OWNER
CERTIFIER'S NAME (print) <span style="float: right;">485.</span>	CERTIFIER'S TITLE: <span style="float: right;">486.</span>				
NAME OF CERTIFIER'S EMPLOYER (DBA) <span style="float: right;">488.</span>	<b>CERTIFIER'S RELATIONSHIP TO TANK OWNER</b> <span style="float: right;">489.</span> <input type="checkbox"/> 1. TANK OWNER <input type="checkbox"/> 2. TANK OPERATOR <input type="checkbox"/> 3. CONTRACTOR <input type="checkbox"/> 4. PROPERTY OWNER <input type="checkbox"/> 5. OTHER AUTHORIZED AGENT OF TANK OWNER				
<b>Rationale</b>	CERS1 should align with the UPCF and the Data Dictionary by NOT allowing multiple values for this field.				
<b>Impacts</b>	CERS1 should be modified to restrict users to a single Certifier's relationship type.				

**UST Monitoring UPCF should show Title 27 Code Values (Recommended)**

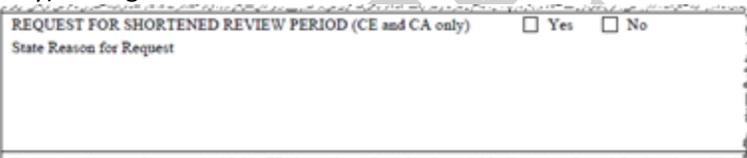
<b>Status</b>	Recommended					
<b>Description</b>	<p>A majority of the multiple-choice options for the UST Monitoring Plan have numeric valid values (01 = Annually, 02 = Biennially, etc.) in the Title 27 Data Dictionary, but have such as 'a, b, c' choices in the form. This is inconsistent with all other UPCF forms.</p> <p><b>Example:</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">490-24</td> <td style="width: 25%;">Tank integrity Testing Frequency</td> <td style="width: 25%;">01 = Annually 02 = Biennially 99 = Other</td> <td style="width: 10%; text-align: center;">1</td> <td style="width: 25%;">Frequency of Tank Integrity Testing</td> </tr> </table> <p><input type="checkbox"/> 5. TANK INTEGRITY TESTING PER [23 CCR §2643.1] <span style="float: right;">490-23.</span></p> <p>TEST FREQUENCY:    <input type="checkbox"/> a. ANNUALLY    <input type="checkbox"/> b. BIENNIALY    <input type="checkbox"/> c. OTHER (Specify): _____ <span style="float: right;">490-24. 490-25.</span></p>	490-24	Tank integrity Testing Frequency	01 = Annually 02 = Biennially 99 = Other	1	Frequency of Tank Integrity Testing
490-24	Tank integrity Testing Frequency	01 = Annually 02 = Biennially 99 = Other	1	Frequency of Tank Integrity Testing		
<b>Rationale</b>	Ensure consistency across all UPCF forms and avoid confusion about correct values.					
<b>Impacts</b>	The UPCF title "Underground Storage Tank Monitoring Plan" will need to be modified to show all the correct Data Dictionary codes for all field values.					

**UST Monitoring Piping Secondary Containment Field (#490-29) (Required)**

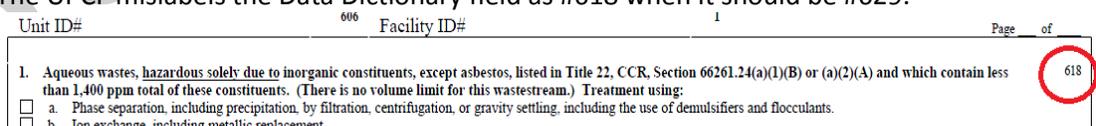
<b>Status</b>	REQUIRED
<b>Description</b>	The Data Dictionary restricts users to specifying a single type of piping secondary containment. The UPCF form's instructions tell users to check the appropriate box (not box(es)). CERS1 allows users to choose more than one relationship between the Certifier and the Tank Owner.

	<table border="1"> <tr> <td data-bbox="349 138 446 268">490-29</td> <td data-bbox="446 138 609 268">Piping Secondary Containment</td> <td data-bbox="609 138 852 268">           01 = Dry            02 = Liquid-filled            03 = Pressurized            04 = Under Vacuum         </td> <td data-bbox="852 138 933 268">1</td> <td data-bbox="933 138 998 268">AN</td> <td data-bbox="998 138 1356 268">Type of piping secondary containment</td> </tr> </table>	490-29	Piping Secondary Containment	01 = Dry 02 = Liquid-filled 03 = Pressurized 04 = Under Vacuum	1	AN	Type of piping secondary containment
490-29	Piping Secondary Containment	01 = Dry 02 = Liquid-filled 03 = Pressurized 04 = Under Vacuum	1	AN	Type of piping secondary containment		
	<p>490-27. OTHER (Specify):</p> <p><b>V. PIPE MONITORING IS PERFORMED USING THE FOLLOWING METHOD(S)</b> (Check all that apply)</p> <p><input checked="" type="checkbox"/> 1. CONTINUOUS MONITORING OF PIPE/PIPING SUMP(S) AND OTHER SECONDARY CONTAINMENT WITH AUDIBLE &amp; VISUAL ALARMS. 490-28</p> <p>23 CCR §2636 SECONDARY CONTAINMENT IS: <input type="checkbox"/> a. DRY <input type="checkbox"/> b. LIQUID FILLED <input type="checkbox"/> c. PRESSURIZED <input type="checkbox"/> d. UNDER VACUUM 490-29</p> <p>PANEL MANUFACTURER: _____ 490-30. MODEL #: _____ 490-31.</p> <p>LEAK SENSOR MANUFACTURER: _____ 490-32. MODEL #(S): _____ 490-33.</p> <p>PIPING LEAK ALARM TRIGGERS AUTOMATIC PUMP (i.e., TURBINE) SHUTDOWN. <input checked="" type="checkbox"/> a. YES <input type="checkbox"/> b. NO 490-34.</p> <p>FAILURE/DISCONNECTION OF THE MONITORING SYSTEM TRIGGERS AUTOMATIC PUMP SHUTDOWN. <input checked="" type="checkbox"/> a. YES <input type="checkbox"/> b. NO 490-35.</p> <p><input checked="" type="checkbox"/> 2. MECHANICAL LINE LEAK DETECTOR (MILLD) THAT ROUTINELY PERFORMS 2.0 psia LEAK TESTS AND RESTRICTS OR SHUTS OFF 490-36</p> <p>490-29. SECONDARY CONTAINMENT: If V-1 is checked, Check the appropriate box to describe the environment inside piping second</p> <p>Note: This field (#490-29) does have a length error in the data dictionary. It is currently AN(1) and needs to be AN(2) to support the three code values (01, 02, 03, 04).</p>						
<b>Rationale</b>	CERS1 should align with the UPCF and the Data Dictionary by NOT allowing multiple values for this field						
<b>Impacts</b>	CERS1 should be modified to restrict users to a single type of piping secondary containment.						

**Onsite HazWaste Treatment Notification-Facility UPCF includes a field not in Data Dictionary (Required/Direction Needed)**

<b>Status</b>	CHANGE REQUIRED BUT DIRECTION NEEDED
<b>Description</b>	<p>This UPCF includes a Y/N field captioned "Request for Shortened Review Period (CE and CA only)" along with a text field for the reason that does not have a matching field in Title 27.</p> 
<b>Rationale</b>	<p>To resolve this discrepancy, should:</p> <ul style="list-style-type: none"> <li>Two fields be added to the Data Dictionary—Shortened Review Request (#601f) and Shortened Review Justification (#601g)?, or,</li> <li>Should these fields be removed from the UPCF and CERS.</li> </ul>
<b>Impacts</b>	To be determined

**Conditionally Authorized (CA) UPCF has a Field Labeling Error (Required)**

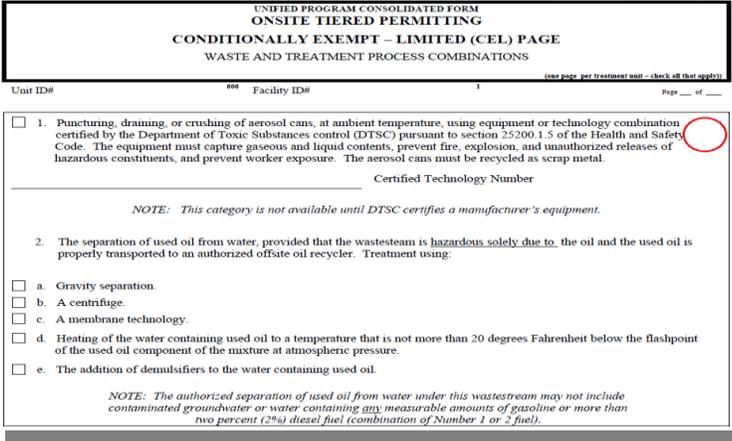
<b>Status</b>	REQUIRED
<b>Description</b>	<p>The UPCF mislabels the Data Dictionary field as #618 when it should be #629.</p> 
<b>Rationale</b>	The UPCF should correctly identify the Data Dictionary element it is referencing.
<b>Impacts</b>	UPCF form will be corrected.

## Conditionally Authorized (CA) UPCF: Should *Not In Use* options be added to Data Dictionary?

**[Required/Direction Needed]**

<b>Status</b>	<b>CHANGE REQUIRED BUT DIRECTION NEEDED</b>
<b>Description</b>	<p>No data entry or Data Dictionary field is captured for Questions 10 and 11 on the Conditionally Authorized (CA) UPCF. If the reporter is unable to actively select these values, how can the UPA know the intention of the reporter?</p> <p>10. Not in use/exempted—formerly recovery of silver from photofinishing.</p> <p>11. Not in use/sunsetted—formerly treatment of spent cleaners and conditioners which are hazardous solely due to copper or copper compounds. Treatment of this wastestream is no longer allowed under Conditional Authorization as of January 1, 1998. Treatment of this wastestream now requires authorization under either Permit by Rule or, if the total volume treated is less than 55 gallons per month, under Conditionally Exempt Small Quantity Treatment.</p>
<b>Rationale</b>	<p>To resolve this discrepancy, should:</p> <ul style="list-style-type: none"> <li>• One or two fields be added to the Data Dictionary to capture values for Question 9 and/or 10?, or,</li> <li>• Should these fields be removed from the UPCF?, or,</li> <li>• Should this issue be dropped?</li> </ul>
<b>Impacts</b>	To be determined.

## Conditionally Exempt-Limited (CEL) UPCF: Field Label Missing for Field #631 (Required)

<b>Status</b>	<b>REQUIRED</b>
<b>Description</b>	<p>The UPCF is missing a label for the Data Dictionary field #631.</p> 
<b>Rationale</b>	The UPCF should correctly identify the Data Dictionary element it is referencing.
<b>Impacts</b>	UPCF form will be corrected.